

The logo for Hogan Lovells, featuring the firm's name in a serif font on a yellow rectangular background.

Hogan Lovells US LLP  
390 Madison Avenue  
New York, NY 10017  
T +1 212 918 3000  
F +1 212 918 3100  
www.hoganlovells.com

February 26, 2020

Hon. Andrew L. Carter, Jr.  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Lovati, et al. v. Petróleos de Venezuela, S.A.*  
S.D.N.Y. Docket No. 1:19-cv-04799-DAB

Dear Judge Carter:

This firm represents defendant Petróleos de Venezuela, S.A. (“PDVSA”) in the above-referenced action. We write in response to the letter from counsel for plaintiffs Sergio Lovati, Rudi Lovati, Alessandra Sarago Lovati and Alessandra Lovati (together, “Plaintiffs”) dated February 20, 2020 (Dkt. No. 33).

Contrary to Plaintiffs’ assertion, the three cases referenced in Plaintiffs’ letter are completely unrelated to this case. Those cases arise from different debt instruments from those at issue in this case and seek different relief under different circumstances. Specifically, none of those cases affect PDVSA’s pending motion to dismiss, which seeks dismissal on the grounds that (1) the debt instruments at issue expressly prohibit this suit, and (2) Plaintiffs’ demand for future damages is premature.

If the Court is inclined to schedule oral argument on PDVSA’s motion, we would welcome the opportunity to further address these issues at that time.

Respectfully yours,  
/s/ Robin L. Muir  
Robin L. Muir

Senior Associate  
robin.muir@hoganlovells.com  
D 212 918 3264

cc: All Counsel of Record (*via ECF*)